

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re: ) Chapter 7  
 )  
DECURTIS HOLDINGS LLC, *et al.*,<sup>1</sup> ) Case No. 23-10548 (JKS)  
 )  
Debtors. ) (Jointly Administered)  
 )  
 ) **Hearing Date: TBD**  
 ) **Objection Deadline: October 10, 2023 at 4:00 p.m. (ET)**

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**SUMMARY OF FINAL APPLICATION OF OMNI AGENT SOLUTIONS, INC.  
FOR COMPENSATION FOR SERVICES RENDERED AND FOR  
REIMBURSEMENT OF EXPENSES AS ADMINISTRATIVE AGENT TO THE  
DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD OF  
APRIL 30, 2023 THROUGH AUGUST 29, 2023**

Name of Applicant: Omni Agent Solutions, Inc.

Authorized to Provide Professional Services to: the above-captioned Debtors and Debtors  
in Possession

Date of Retention: June 5, 2023 effective as of April 30, 2023

Period for which compensation  
and reimbursement are sought: April 30, 2023 through August 29, 2023

Amount of Final Compensation sought as  
actual, reasonable, and necessary: \$46,369.80

Amount of Final Expense Reimbursement  
sought as actual, reasonable, and necessary: \$0.00

This is a(n): monthly interim  final

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<sup>1</sup> The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number include: DeCurtis Holdings LLC (2384) and DeCurtis LLC (9241). The location of the Debtors' service address in these chapter 7 cases is 3208 East Colonial Drive, Suite C190, Orlando, FL 32803.

**FINAL COMPENSATION BY PROFESSIONAL**  
**APRIL 30, 2023 THROUGH AUGUST 29, 2023**

| <b>Professional</b>  | <b>Hours</b> | <b>Rate</b> | <b>Total</b>        |
|----------------------|--------------|-------------|---------------------|
| Ada Ferrer           | 1.7          | \$165.00    | \$280.50            |
| Anthony Roque        | 5.2          | \$130.00    | \$676.00            |
| Brittney Whitaker    | 4.7          | \$240.00    | \$1,128.00          |
| Carrie Hernandez     | 26.5         | \$175.00    | \$4,637.50          |
| Emory Rundle         | 5.3          | \$110.00    | \$583.00            |
| Javon Couch          | 29.9         | \$145.00    | \$4,335.50          |
| John Doherty         | 10.9         | \$180.00    | \$1,962.00          |
| Kim Steverson        | 77.3         | \$240.00    | \$18,552.00         |
| Linda Semo           | 1.0          | \$145.00    | \$145.00            |
| Luis Solorzano       | 21.0         | \$240.00    | \$5,040.00          |
| Marina Khan          | 13.9         | \$175.00    | \$2,432.50          |
| Nathan Panameno      | 2.2          | \$200.00    | \$440.00            |
| Noah Hurst           | 10.2         | \$145.00    | \$1,479.00          |
| Sejal Kelly          | 20.1         | \$240.00    | \$4,824.00          |
| Tara Saldajeno       | 0.9          | \$120.00    | \$108.00            |
| Tiffany Wilson       | 4.9          | \$110.00    | \$539.00            |
| Yelena Bederman      | 21.8         | \$200.00    | \$4,360.00          |
| <b>SUB-TOTAL</b>     | <b>257.5</b> | ----        | <b>\$51,522.00</b>  |
| <b>DISCOUNT</b>      | ----         | ----        | <b>(\$5,152.20)</b> |
| <b>REVISED TOTAL</b> | <b>257.5</b> | ----        | <b>\$46,369.80</b>  |

**FINAL COMPENSATION BY PROJECT CATEGORY**  
**APRIL 30, 2023 THROUGH AUGUST 29, 2023**

| <b>CATEGORY</b>                    | <b>HOURS</b> | <b>TOTAL</b>        |
|------------------------------------|--------------|---------------------|
| Preparation of Schedules and SoFAs | 257.5        | \$51,522.00         |
| <b>SUB-TOTAL</b>                   | <b>868.5</b> | \$51,522.00         |
| <b>DISCOUNT</b>                    | ----         | <b>(\$5,152.20)</b> |
| <b>REVISED TOTAL</b>               | <b>257.5</b> | <b>\$46,369.80</b>  |

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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|   |   |   |
|---|---|---|
| In re:  | ) | Chapter 7   |
|   | ) |   |
| DECURTIS HOLDINGS LLC, <i>et al.</i> <sup>2</sup> | ) | Case No. 23-10548 (JKS)                                       |
|   | ) |   |
| Debtors.  | ) | (Jointly Administered)  |
|   | ) |   |
|   | ) | <b>Hearing Date: TBD</b>                                      |
|   |   | <b>Objection Deadline: October 10, 2023 at 4:00 p.m. (ET)</b> |

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**FINAL APPLICATION OF OMNI AGENT SOLUTIONS, INC. FOR  
COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF  
EXPENSES AS ADMINISTRATIVE AGENT TO THE DEBTORS AND DEBTORS IN  
POSSESSION FOR THE PERIOD OF APRIL 30, 2023 THROUGH AUGUST 29, 2023**

Pursuant to Sections 330 and 331 of title 11 of the United States Code, §§ 101-1532 (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 174] (the “Administrative Order”) and the *Order Granting Emergency Motion of the Debtors (I) for an Order, Pursuant to Section 1112(A) and (B) of the Bankruptcy Code, Converting the Debtors’ Cases to Cases Under Chapter 7 (II) Establishing a Deadline for Filing Final Chapter 11 Fee Applications and Setting a Hearing Thereon and (III) Granting Related Relief* [Docket No. 545] (the “Conversion Order”), Omni Agent Solutions, Inc. (“Omni”) hereby files this *Final Application of Omni Agent Solutions, Inc. for Compensation for Services Rendered and for Reimbursement of Expenses as Administrative Agent to the Debtors and Debtors in Possession for*

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<sup>2</sup> The Debtors in these chapter 7 cases, along with the last four digits of each Debtor’s federal tax identification number include: DeCurtis Holdings LLC (2384) and DeCurtis LLC (9241). The location of the Debtors’ service address in these chapter 7 cases is 3208 East Colonial Drive, Suite C190, Orlando, FL 32803.

*the Period of April 30, 2023 Through August 29, 2023* (the “Application”). By the Application, Omni seeks final allowance with respect to the sums of \$46,369.80 as compensation and \$0.00 for reimbursement of actual and necessary expenses, for a total of \$46,369.80 for the period April 30, 2023 through and including August 29, 2023 (the “Final Compensation Period”). In support of this Application, Omni respectfully represents as follows:

**Background**

1. On April 30, 2023 (the “Petition Date”), DeCurtis Holdings LLC and its affiliated entities (collectively, the “Debtors”) filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Court”) commencing the above-captioned chapter 11 cases (the “Chapter 11 Cases”).
2. The Debtors have continued possession of their property and have continued to operate and maintain their business as debtors in possession under sections 1107 and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Cases.
3. Omni was retained effective as of the Petition Date by this Court’s Order, dated June 5, 2023 [Docket No. 210] (the “Retention Order”). The Retention Order authorized Omni to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

**Compensation Paid and its Source**

4. All services for which compensation is requested by Omni were performed for or on behalf of the Debtors.
5. Omni has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application, except to the extent otherwise disclosed. There is no agreement or

understanding between Omni and any other person other than the Partners of Omni for the sharing of compensation to be received for services rendered in these cases.

## **Fee Statement**

6. The fee statement for the Final Compensation Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each professional for the Final Compensation Period. To the best of Omni's knowledge, this Application complies with Sections 330 and 331 of the Bankruptcy Code, the applicable Bankruptcy Rules, Local Rule 2016-2, applicable Third Circuit law, the Administrative Order and the Conversion Order.

### **Actual and Necessary Expenses**

7. Omni incurred no expenses during the Final Compensation Period.

### **Summary of Services Rendered**

8. Omni seeks allowance of compensation of professional services rendered to the Debtors during the Compensation Period in the amount of \$46,369.80. In addition, Omni seeks approval for reimbursement of expenses incurred in connection with the rendition of its services in the aggregate amount of \$0.00. During the Compensation Period, Omni professionals expended a total of 257.5 hours for which compensation is requested. The fees charged by Omni in this proceeding are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period.

9. The following summary highlights the major areas in which Omni rendered services during the Compensation Period:

Omni received and reviewed numerous documents from the Debtors and their other retained professionals in preparation of the Debtors' Schedules and Statements of

Financial Affairs (“SoFAs). Omni created multiple drafts of the Schedules and SoFAs and communicated frequently via email and conference calls with the Debtors and their professionals to prepare and finalize the Schedules and SoFAs.

**Valuation of Services**

10. Omni’s professionals spent a total of 257.5 hours in connection with this matter during the Final Compensation Period. The nature of the work performed by these professionals during the Final Compensation Period is fully set forth in **Exhibit A** attached hereto. These are similar to Omni’s general hourly rates for work of this character. The reasonable value of the services rendered by Omni to the Committee during the Final Compensation Period is \$46,369.80.

11. In accordance with the factors enumerated in Section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Omni is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services and (e) the costs of comparable services other than in a case under this title. Moreover, Omni has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with that Rule.

*[The rest of this page intentionally left blank.]*

WHEREFORE, Omni respectfully requests that the Court authorize that for the Final Compensation Period, an allowance be made to Omni pursuant to the terms of the Administrative Order and the Conversion Order, with respects to the sum of \$46,369.80 as compensation for necessary professional services rendered and the sum of \$0.00 as reimbursement of actual necessary costs and expenses, for a total of \$46,369.80 and that such sums be authorized for payment and for such other and further relief as this Court may deem just and proper.

Dated: September 19, 2023  
New York, New York

Respectfully submitted,

/s/ Paul H. Deutch  
Paul H. Deutch  
Executive Vice President  
**OMNI AGENT SOLUTIONS, INC.**  
1120 Avenue of the Americas, 4<sup>th</sup> Fl.  
New York, NY 10036  
Telephone: (212) 302-3580  
Email: pdeutch@omniagnt.com

*Administrative Agent for the Debtors*

**VERIFICATION**

I, Paul H. Deutch, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following statements are true and correct to the best of my knowledge and based on the information and records available to me:

- a) I am the Executive Vice President of the applicant firm, Omni Agent Solutions, Inc.
- b) I am familiar with the work performed on behalf of the Debtors by the professionals in the firm.
- c) I have reviewed the foregoing Application and the facts set forth therein are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed Del. Bankr. L.R. 2016-2 and submit that the Application substantially complies with such rule.

*/s/ Paul H. Deutch*

Paul H. Deutch